

## **FACT SHEET**

**FOR THE DRAFT RESTRICTED COMMERCIAL  
PREPARED FOR**

**CYTEC INDUSTRIES INC.**

EPA ID# LAD008175390  
Agency Interest #1357

10800 River Road  
Westwego, LA 70094  
Jefferson Parish

Permit Number LAD008175390-OP-RN-1  
PER19980002

### **I. INTRODUCTION**

This fact sheet has been developed in accordance with the Louisiana Administrative Code (LAC) 33:V.703.D and briefly sets forth principal and significant facts, legal, methodological and policy requirements of the proposed draft hazardous waste operating permit for CYTEC Industries, Inc., EPA ID Number LAD008175390, Agency Interest Number 1357 for the Fortier Facility located in Westwego, Louisiana, Jefferson Parish.

The Louisiana Department of Environmental Quality (LDEQ) has prepared this proposed draft hazardous waste operating permit which addresses the requirements of LAC Title 33, Part V, Subpart 1 and the Federal Resource Conservation and Recovery Act (RCRA) as amended by the 1984 Hazardous and Solid Waste Amendments (HSWA).

Cytec Industries, Inc. is seeking a hazardous waste permit governing the operating of Treatment tanks Catalyst Settling Tank (TA-403), Primary Filter Feed Tank (TA-404), Secondary Filter Feed Tank (MF-307), WWCB Well Injection Tank (TA-402), North and South WWCB Backwash Tanks, MET NSB/RCB Backwash Tank (100-6), MET Tanks 1 and 2, and MET Injection Tank (T-500), Container Storage Building, and Primary and Secondary Sand Filters (F-401 A-D), Cartridge Filters (CF-401 A-D) and Miscellaneous Effluent Sand Filters (HRDV50 A-D).

## **A. THE PERMITTING PROCESS**

The purpose of this fact sheet is to initiate the permitting decision process. The LDEQ's Waste Permits Division is required to prepare this draft hazardous waste permit. The draft hazardous waste permit sets forth all the applicable conditions, which the permittee is required to comply with during the life of the permit. Cytec Industries submitted an application on June 1, 1998.

The permitting process will afford the LDEQ, interested citizens, and other agencies the opportunity to evaluate the ability of the permittee to comply with the requirements of the LAC 33:V, Subpart 1 and the Hazardous and Solid Waste Amendments (HSWA) portion.

The public is given a minimum of forty-five (45) days to review and comment on the draft operating permit. The Administrative Authority, prior to making a decision or taking any final action on the draft permit, will consider all significant comments. The decision of the Administrative Authority shall be to issue, deny, modify, or revoke the draft post-closure permit in accordance with LAC 33:V.705.

## **B. DRAFT HAZARDOUS WASTE PERMIT**

The Waste Permits Division reviewed the permit application and other pertinent technical information, and prepared a draft permit that contains the language that pertains to the operation, maintenance, and closure of the listed facilities.

This draft hazardous waste permit is a tentative determination and is not the final decision of the Administrative Authority.

## **C. PUBLIC COMMENT PERIOD**

LAC 33:V.715 requires that the public be given at least forty-five (45) days to comment on a draft permit decision.

The specific dates for the opening and closing of the public comment period are contained in the public notice that was issued for this particular permitting action. Any person interested in commenting on the draft permit for the Cytec Industries Inc., Fortier Facility must do so within the allotted forty-five (45) day comment period. Public notice of the proposed permitting action shall be published in specified newspapers, announced on the designated radio station, and mailed to those persons contained on the facility's mailing list.

A public hearing for the draft permit will be held only if requested in writing. The date, location and time would be provided in separate public notice. LDEQ will hold the hearing at least forty-five (45) days after the date on which the public notice is given.

#### **D. LOCATIONS OF AVAILABLE INFORMATION**

The administrative record, including all supporting documents is on file at the LDEQ Public Records Center, Room 127, 602 North 5th Street, Baton Rouge, Louisiana. These documents may be inspected and copied (at \$0.25 per copy page) at any time between the hours of 8:00 to 4:30 p.m., Monday through Friday (except holidays).

In addition, a copy of the draft operating permit, fact sheet, and supporting documents are available for review at the Jefferson Parish Library- Westwego Branch located at 635 Fourth St, Westwego, LA 70094.

#### **WRITTEN COMMENT SUBMISSION**

Interested persons may submit written comments on the draft operating permit to the Administrative Authority, at the address listed below, on or before the closing date of the comment period. All comments should include:

- (1) the name and address of the commenter,
- (2) a concise statement of the exact basis for any comment and supporting relevant facts, upon which the comment is based,
- (3) identification of the facility commented on (the EPA Identification Number and the AI number), and
- (4) supporting relevant facts upon which the comments are based.

All comments, further requests for information (including copies of this decision and fact sheet) and any requests by public interest groups or individuals who would like to be included in the mailing list, should be made in writing to

Ms. Soumaya Ghosn  
Louisiana Department of Environmental Quality  
Office of Environmental Services  
Post Office Box 4313  
Baton Rouge, Louisiana 70821-4313  
(225) 219-3276 or fax (225) 219-3309

Any technical questions regarding this draft permit should be addressed to:

Ms. Amy Exnicios  
Louisiana Department of Environmental Quality  
Office of Environmental Services  
Waste Permits Division  
P.O. Box 4313  
Baton Rouge, Louisiana 70821-4313  
(225) 219-0029 or fax (225) 219-3158

## **II. DESCRIPTION OF OVERALL SITE**

Cytec Industries, Inc. is the owner and operator of the Fortier Facility. Cytec is a Chemical Manufacturing complex currently producing: acetonitrile, acrylonitrile, aminonitrile, ammonia, melamine, methanol, and sulfuric acid. Acrylamide and Methyl Methacrylate are also produced on site but are not owned by Cytec. Kemira owns the acrylamide unit and Cyro owns the methyl Methacrylate unit. Cytec receives wastes from the Cyro and Kemira owned units for treatment, storage and ultimate disposal in Cytec deep injection wells permit by Louisiana Department of natural resources. The permitted hazardous waste units include ten (10) treatment tanks, one (1) container storage building, two (2) primary sand filters, two (2) secondary sand filters, four (4) cartridge filters, and four (4) miscellaneous effluent sand filters. Cytec currently is classified as restricted commercial. Having the restricted commercial status Cytec may receive waste from the Methyl Methacrylate Plant and the Acrylamide owned by Cyro and Kemira, respectively, located on- the Fortier facility.

## **III. HAZARDOUS WASTE FACILITIES**

The Fortier Facility has ten (10) treatment tanks, one (1) container storage building, two (2) primary sand filters, two (2) secondary sand filters, four (4) cartridge filters, and four (4) miscellaneous effluent sand filters.

## **IV. FINANCIAL AND LIABILITY REQUIREMENTS**

Cytec Industries Inc. has submitted documentation to satisfy the financial assurance and liability requirements of LAC 33:V. Chapter 37.

## **V. SUMMARY OF ENVIRONMENTAL FACTORS CONSIDERED**

In accordance with the requirements set forth by the Louisiana Supreme Court in Save Ourselves v. Louisiana Environmental Control Commission 1152 (la. 1983), the LDEQ has considered the following factors in its draft decision on this renewal operating permit. This is a preliminary based on information currently available to the LDEQ.

**A. The potential and real adverse environmental effects of the proposed project have been avoided to the maximum extent possible.**

Cytec submitted its renewal application for the Fortier site, which includes ten (10) treatment tanks, one (1) container storage building, two (2) primary sand filters, two (2) secondary sand filters, four (4) cartridge filters, and four (4) miscellaneous effluent sand filters.

All tanks are equipped with safety cutoffs, bypass systems, and pressure control systems to ensure that the tanks do not spill or overflow. Should a tank spill or overflow, all tank systems and the container storage building have secondary containment systems that will be able to keep hazardous waste from adversely affecting the environment. All ignitable wastes at Cytec are handled in order to help prevent ignition.

Potential releases are minimized due to the strict operating and design standards implemented by Cytec. These actions along with meeting state and federal environmental requirements for transportation, storage, and treatment of all hazardous wastes minimize potential and real adverse environmental effects to the maximum extent possible.

**B. A cost benefit analysis of the environmental impact balanced against the social and economic benefits of the project demonstrates that the social and economic benefits outweigh environmental impacts.**

This is an existing facility submitting an application for recommitting of its onsite hazardous waste treatment tanks, container storage building and filter systems. The activities on site are conducted in ways that prevent adverse environmental impacts.

Renewal of the existing permit should not negatively effect on property values, the tax base, economic development, or public costs as they pertain to the economics of the local community. The renewal of Cytec's permit should not create a need for additional fire protection, police, medical facilities, or roads.

**C. There are no alternative projects or alternative sites or mitigating measures which offer more protection to the environment than the proposed project without unduly curtailing non-environmental benefits to the extent applicable.**

**1. ALTERNATIVE PROJECTS**

This is the renewal of the existing permit for Cytec Industries. There appears to be no known alternative project that would offer more protection to the environment than permitting the existing facilities without unduly curtailing

non-environmental benefits. Relocating the ten (10) treatment tanks, one (1) container storage building, two (2) primary sand filters, two (2) secondary sand filters, four (4) cartridge filters, and four (4) miscellaneous effluent sand filters, could create greater environmental impact when transportation of hazardous waste is considered. The facility has been in operation since 1952 and has proven to be reliable.

## 2. ALTERNATIVE SITE

The existing facility currently provides treatment and storage operations for the existing production units. Relocating these units to different locations could cause greater environmental impact when transportation is considered, as well as the increase of hazardous waste production and transportation. When all factors are considered, no other site would offer more protection to the environment than the existing facility.

## 3. MITIGATING MEASURES

Cytec Industries Inc. is an existing facility. It is renewing the existing permit that has been effective for ten years and will maintain current facility operations. No mitigating measures would offer more protection to the environment than repermitting the existing facilities without unduly curtailing non environmental benefits.